

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
Case No.**

DR. JAMES ERIC MCDONOUGH, individually,
Plaintiff,

vs.

JEFFREY DUANE PORTER, in his individual capacity,
PORTER FOR MAYOR, a political campaign in the state
Florida, and JOHN DOE, in his individual capacity,
Defendants.

VERIFIED COMPLAINT

INTRODUCTION

1. Defendant, ex-Mayor Jeff Porter (Porter) runs an election campaign, Porter for Mayor (the Campaign), the Campaign, Porter and/or campaign worker John Doe (Doe) operate an official social media page on the website Facebook.com. Hereafter, these entities are collectively referred to as Defendant or Defendants. The title of the website is Jeff Porter for Mayor (the Facebook Page). The Facebook Page is a conspicuous political page which encourages the viewers to comment and express their opinion on current events as well as political and social matters. Whereas, the public is invited to make comments to posts on various topics placed on the Facebook Page wall.

2. The Facebook Page, in the about section, states "We reserve the right to remove off-topic comments. This is not an official government page or connected to the City of Homestead Government." No other rules to govern conduct are provided.

3. Despite affirmatively opening this page for discourse and commentary, the Plaintiff has had his comments removed in violation of his First Amendment freedom of speech.

JURISDICTION

4. Plaintiff brings this action pursuant to 42 U.S.C. § 1983 for violation of his rights under the First and Fourteenth Amendments to the United States Constitution.

5. This court has jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1343(a)(3). Declaratory relief is authorized by 28 U.S.C. §§ 2201 and 2202, and injunctive relief pursuant to Fed.R.Civ.P. 65.

6. Venue is proper under 28 U.S.C. § 1391.

PARTIES

7. Plaintiff, Dr. James Eric McDonough (McDonough), is a resident of Miami-Dade County, Florida.

8. Defendant, Jeff Porter for Mayor (the Campaign), is a legal entity established under the election laws of the state of Florida and was at all times relevant to the case authorized by law to control and maintain the Facebook Page, Jeff Porter for Mayor, which is running political advertisements in Miami-Dade County, Florida.

9. Defendant, Jeff Porter (Porter), a resident of Miami-Dade County Florida is the head executive of the Campaign and was at all times relevant to the case, acting under the color of state law, and was authorized by law to control and monitor the activities of the Campaign and its Facebook Page activities.

10. Defendant, John Doe (Doe) was at all times relevant to the case, an employee or agent of the Campaign, acting under color of state law, and acting within the course and scope of his employment with the Campaign. The true name and capacity of John Doe is not currently

known to McDonough. McDonough will amend this complaint to reflect the true name of the party at such time as it becomes known.

FACTS

11. Defendants operate a political Facebook Page. The purpose of the page is to share information with the community. Visitors are permitted to express their opinions on the Facebook Page. However, the Campaign reserves the right to remove comments deemed to be “off topic.” There are no definitions on the page as to what is to be deemed “off topic.”

12. The Campaign publishes posts on its Facebook Page, about information relating to items of general interest as well as things directly related to the Campaign and the upcoming election for mayor of the City of Homestead (Homestead). Visitors to the page are invited to read and “comment” on the posts.

13. The “comment” button allows the visitor to write, in his or her own words, a response to that post on the Facebook page. When a visitor comments, all those viewing the page can see and read the comment.

14. On July 19, 2019, the Campaign placed a post advising the public that Porter valued the opinions of others regarding issues facing Homestead residents, and asked viewers to participate in a survey.

15. On September 1, 2019, Plaintiff, while visiting the page, posted several comments in response to the Campaign’s post. Plaintiff’s first comment asked whether his comments would be deleted, along with other issues directly concerning Homestead, Porter and/or the Campaign. His second comment asked if Porter would sit down for an interview with Plaintiff in his capacity as a journalist. Plaintiff also addressed another commenter and advised them to take a screenshot

of their comment before it was deleted. Plaintiff's last comment related to the activity of one of the Campaign's workers/contributors attacking him on his page, True Homestead. See **Exhibit A**.

16. On September 2, 2019, Plaintiff discovered that his comments, as well as those of others who had been critical of the Campaign or Porter had been deleted, but other comments asking general questions or offering praise remained. See **Exhibit B**.

17. Additionally, on September 2, 2019, Plaintiff and others made new comments about their original comments being deleted. See **Exhibit C**.

18. On September 3, 2019, Plaintiff discovered that these new comments and those of others which did not paint a positive light on Porter had been deleted, while again positive comments and questions remained. See **Exhibit D**.

19. The Defendants worked collectively and/or individually to delete comments which were critical and/or could show Porter in a bad light, while comments which were positive and/or would show Porter in a good light were not removed. These censorship actions were used to create a false public narrative of support and/or to create a false narrative of a lack of opposition, thereby attempting to affect the outcome of the election by manipulating public opinions and perceptions.

**Count I- Violation of the First and Fourteenth Amendments to the United States
Constitution and 42 U.S.C. §1983
(Against all Defendants)**

20. Plaintiff McDonough re-alleges and incorporates by reference paragraphs 1-19 above.

21. The Defendants collectively or singularly have engaged in arbitrary censorship of commentary that is posted on the Facebook Page of the Campaign. This censorship occurred by deleting Plaintiff's comments for political and/or other unconstitutional reasons.

22. The Facebook Page being a political campaign page is a public, not private, forum and political discourse made there constitutes pure speech. Further, social media sites such as the Facebook Page have been analogized by the Supreme Court to a “traditional” public forum. *See Packingham v. North Carolina*, 137 S. Ct. 1730, 1735 (2017).

23. There are no stated policies on the Facebook Page that put Plaintiff or any visitor on notice as to what comments would be considered “off topic.”

24. Other comments which could arguably be “off topic” but of a positive nature were not removed—only comments which were critical of Porter or the Campaign were deleted.

25. Plaintiff’s comments that were censored cannot be considered “off topic.” They were made in reply to a post requesting opinions from residents regarding Homestead. Additionally, Positive comments and questions which were made before and after Plaintiff’s comments have not been deleted.

26. This censorship has deprived Plaintiff of his right to freedom of speech guaranteed by the First and Fourteenth Amendments to the United States Constitution.

27. This censorship is viewpoint based, as it is attempting to limit Plaintiff’s ability to express an ideology or perspective that is unfavorable to the Defendants, and is therefore presumptively invalid.

28. The deliberate actions of the Defendants have risen to the level of policy or custom through its policy makers Porter; and/or Doe; such that the Campaign is responsible for the unconstitutional actions of their employees and officers. In the alternative, the Campaign is vicariously liable for the actions of all its workers.

29. The custom, policy, and/or practices of the Campaign, through its policy makers Porter and/or Doe, was the primary moving force behind the actions of the Campaign that deprived Plaintiff McDonough of his rights under the First and Fourteenth Amendments.

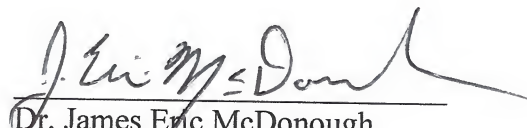
30. As a direct and proximate result of the Defendants' actions, Plaintiff McDonough has suffered irritation and shame at being denied the same access to a public forum as any other citizen of the United States should enjoy. He has also been denied the right to exercise his freedom of speech to communicate on topics of importance to society, during an election cycle no less.

WHEREFORE, Plaintiff respectfully request this Court:

- A. Award the Plaintiff compensatory and punitive damages.
- B. Issue a declaratory judgment that the Defendant's administration of the Facebook Page violates the First and Fourteenth Amendments to the United States Constitution.
- C. Enter a temporary and/or permanent injunction directing the Defendant(s) to cease any further deletion of Plaintiff's comments and/or those of others.
- D. Award reasonable expenses and costs incurred in the litigation, including any reasonable attorney and expert fees, pursuant to 42 U.S.C. §1988.
- E. Order other relief the Court deems just and equitable.

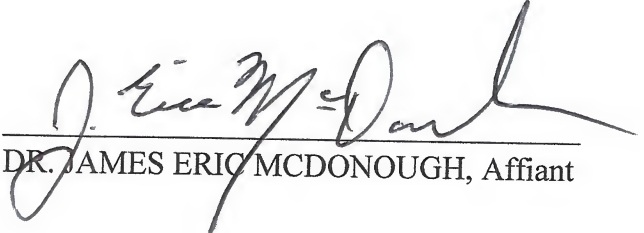
Dated: September 6, 2019

Respectfully submitted,


Dr. James Eric McDonough,
Pro se Plaintiff
32320 S.W. 199th Avenue
Homestead, FL 33030
571-245-5410
Phd2b05@gmail.com

VERIFICATION PAGE

As Affiant, I, Dr. James Eric McDonough, hereby declare under penalty of perjury that the above facts are true and correct to the best of my knowledge and ability. Further, Affiant sayeth not.

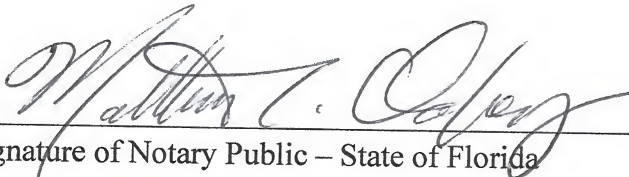


DR. JAMES ERIC MCDONOUGH, Affiant


STATE OF FLORIDA

COUNTY OF MIAMI-DADE

Sworn to and subscribed before me this 6th day of September 2019 by Dr. James Eric McDonough.



Signature of Notary Public – State of Florida



Name of Notary, Typed, Printed or Stamped

~~Known~~ ☒ OR Produced Identification _____

Type of Identification Produced _____

EXHIBIT A

Inbox (7,884) - ph x (19) Dr. Eric McD... x DocumentCloud x Fs. 836.04 - Goog x Statutes & Consti x Jeff Porter For Mo x battery replaceme x +

facebook.com/PorterHomestead/

Apps

Jeff Porter For Mayor

Liked Following Share

Jeff Porter For Mayor
July 19
www.porterformayor.com jporterformayor@gmail.com

I VALUE YOUR OPINION REGARDING OUR CITY.
Please participate in the Homestead Quality of Life survey on my website at PorterForMayor.com

Jeff Porter For Mayor
@PorterHomestead

Home
About
Endorsements
Photos
Videos
Posts
Community

Contact Us Send Message

Facebook is sharing information to help you better understand the purpose of a Page. See actions taken by the people who manage and post content.

Page created - June 20, 2014

Related Pages

Teachers on TV Land
Backie Tejada Nieves likes this
TV Show

ViGu's Corp
Community Organization

HD-Mirror
Warren Redlich likes this
Electronics

Pages Liked by This Page

Homestead Air Reser... Chat (281) 9056

Porter Financial Di...pdf

Type here to search

Inbox (7,884) - ph x (19) Dr. Eric McD... x DocumentCloud x Fs. 836.04 - Goog x Statutes & Consti x Jeff Porter For Mo x battery replaceme x +

facebook.com/PorterHomestead/

Apps

Jeff Porter For Mayor

Liked Following Share

Jeff Porter For Mayor
@PorterHomestead

Home
About
Endorsements
Photos
Videos
Posts
Community

Create a Page

Pages Liked by This Page

Homestead Air Reser... Like

Good Government Init... Like

Coffee News Homeste... Like

English (US) Español Português (Brasil) Français (France) Deutsch +

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Active Chat (281) 9056

Porter Financial Di...pdf

Type here to search

James Eric McDonough Hey Jeff. We are curious if you are gonna delete comments you don't like form your page like you did back in 2014-2015

Remember I have the screen shots to prove it.

Jeff why do you so hate the First Amendment?

Jeff why are you and your campaign to afraid to respond to my messages?

Jeff why are you afraid to answer questions in front of the voters?

Like Reply 1m

Barbara L Wheeler A youth center would be fantastic for our

Browser tabs: Inbox (7,884) - ph x (19) Dr. Eric McD... x DocumentCloud x Fs. 836.04 - Goop x Statutes & Consti... x Jeff Porter For M... x battery replacem... x

facebook.com/PorterHomestead/

Jeff Porter For Mayor

Jeff Porter For Mayor
@PorterHomestead

Home About Endorsements Photos Videos Posts Community

website at
PorterForMayor.com
Thanks in advance!

74 15 Comments 20 Shares

Haha Comment Share

Most Relevant

James Eric McDonough Hey Jeff would you sit down for an interview?
Like Reply · 1m

James Eric McDonough Hey Jeff. We are curious if you are gonna delete comments you don't like form your page like you did back in 2014-2015
Remember I have the screen shots to prove it.

Contact Us Send Message

Page created - June 20, 2014

Related Pages

Teachers on TV Land
Beckie Tejeda Nieves likes this
TV Show

VIGU's Corp
Community Organization

HD-Mirror
Warren Redlich likes this
Electronics

Pages Liked by This Page

Homestead Air Reser... Chat (303)

Porter Financial Di...pdf

Type here to search

Browser tabs: Inbox (7,884) x (19) Dr. Eric McD... x DocumentClo... x Fs. 836.04 - G... x Statutes & Co... x True Homeste... x batteries plus... x Jeff Porter Fo... x

facebook.com/PorterHomestead/posts/2919123864795469?comment_id=3035550476486140¬if_id=1567352952607955¬if_t=feed_comment_reply

Jeff Porter For Mayor

Jeff Porter For Mayor
@PorterHomestead

Home About Endorsements Photos Videos Posts Community

Create a Page

Thanks in advance!

74 18 Comments 20 Shares

Haha Comment Share

Most Relevant

Write a comment

Sonia Castro You value our opinion? You don't even show up when we invite you to our community to listen to your constituents' concerns. GTFOOH
Love Reply · 1m

James Eric McDonough Amen Sonia Castro Screenshot this before he deletes it.
Like Reply · 1m

Contact Us Send Message

community See All

Invite your friends to like this Page

4,293 people like this

4,554 people follow this

Edward Powell and 104 other friends like this

About See All

(305) 216-0095

Send Message

www.porterformayor.com

Political Candidate

Suggest Edits

Page Transparency See More

Facebook is showing information to help you better understand the purpose of a Page. See actions taken by the people who manage and post content.

Page created - June 20, 2014 Chat (344)

Inbox (7,884) x (19) Dr. Eric M. x DocumentClo... x Fs. 836.04 - C x Statutes & Co x True Homeste... x batteries plus x Jeff Porter Fo x + -

facebook.com/PorterHomestead/posts/2919123864795469?comment_id=3035550476486140¬if_id=1567352952607955¬if_t=feed_comment_reply

Jeff Porter For Mayor

Jeff Porter For Mayor
@PorterHomestead

Home
About
Endorsements
Photos
Videos
Posts
Community

Create a Page

survey on my website at
PorterForMayor.com
Thanks in advance!

74
Haha
Comment
Share

19 Comments 20 Shares

Most Relevant

James Eric McDonough Hey Jeff your campaign plants sent to my page to provoke were outed. You really should keep your campaign people on a tighter leash
Like · Reply · 1m

Sonia Castro You value our opinion? You don't even show up when

Contact Us
Send Message
(305) 216-0095
Send Message
www.porterformayor.com
Political Candidate
Suggest Edits

Page Transparency
See More
Facebook is showing information to help you better understand the purpose of a Page. See actions taken by the people who manage and post content.
Page created - June 20, 2014

Related Pages
Teachers on TV Land
Tim Blane likes this TV Show
Like
ViGu's Corp
Community Organization

Porter Financial Di...pdf
Type here to search
11:53 AM
9/17/2019

EXHIBIT B

Facebook page for Jeff Porter For Mayor (@PorterHomestead). The page features a post from July 19 with the text: "I VALUE YOUR OPINION REGARDING OUR CITY. Please participate in the Homestead Quality of Life survey on my website at www.portformayor.com jporterformayor@gmail.com". The post includes a photo of Jeff Porter and a link to the survey. The page also shows a sidebar with navigation links (Home, About, Endorsements, Photos, Videos, Posts, Community) and a right-hand section with contact information and community updates.

Facebook page for Jeff Porter For Mayor (@PorterHomestead). The page features a post from July 19 with the text: "in the Homestead Quality of Life survey on my website at PorterForMayor.com Thanks in advance!". The post includes a photo of Jeff Porter and a link to the survey. The page also shows a sidebar with navigation links (Home, About, Endorsements, Photos, Videos, Posts, Community) and a right-hand section with contact information and community updates. The post has 75 likes, 14 comments, and 22 shares. A comment from Sonia Castro is visible, stating: "You value our opinion so much you erased my comment from yesterday".

Facebook page for Jeff Porter For Mayor (@PorterHomestead). The page shows a list of posts under the "Most Relevant" tab. The posts are:

- Sonia Castro** You value our opinion so much you erased my comment from yesterday. Like Reply 7h
- Barbara L Wheeler** A youth center would be fantastic for our city. Like Reply 5w
- Barbara Agramonte** Jeff has been and will be the best Mayor of Homestead. I was born here in 1947. I have been thru alot of changes. He has done more for this city. Like Reply 6w
- Iglesia Camino Del Rey** Hello Mayor. Although we love the city and its improvements, please do not drive and make things difficult for churches and places of worship that work in this city to continue the efforts in providing moral foundations, encourage virtues within our c... See More. Like Reply 5w

Pages Liked by This Page:

- Homestead Air Reser...
- Homestead Mayor...
- Coffee News Homeste...

Bottom right: Karen Armstrong Chat (329)

Facebook page for Jeff Porter For Mayor (@PorterHomestead). The page shows a list of posts under the "Most Relevant" tab. The posts are:

- Iglesia Camino Del Rey** Hello Mayor. Although we love the city and its improvements, please do not drive and make things difficult for churches and places of worship that work in this city to continue the efforts in providing moral foundations, encourage virtues within our c... See More. Like Reply 5w
- Miguel Hernandez** I told you once that i felt that you, to me have been the best mayor of Homestead and i stand by my words. what ever you need jeff including my vote. Like Reply 6w
- Mark Diehl** Please have more streetlights installed in dark residential areas. I think it will help reduce crime. Like Reply 6w
- Shari Jones Dingley** You know our family stands behind you. Like Reply 6w Edited
- Diana Wilson** You have my vote. Like Reply 6w

Pages Liked by This Page:

- Homestead Air Reser...
- Homestead Mayor...
- Coffee News Homeste...

Bottom right: Karen Armstrong Chat (329)

Facebook page for Jeff Porter For Mayor (@PorterHomestead). The page shows a post by Jeff Porter For Mayor with 4 likes and 1 comment. The post text reads: "Jeff Porter For Mayor Erick, thank you for your comment. The Mayor does not set the price our residents pay for electricity. I understand your frustration as I have had this issue brought up during the campaign. Just to get the facts straight. Our water rates are among the lowest in Miami-Dade County and our electric rates are in-line with other providers in Florida. Of course it does not help that we have had some of the hottest temperatures on record this summer as we cool our homes."

Comments:

- Diana Wilson: You have my vote (4 likes)
- Stan Nelson: Can I vote for you? (2 likes)
- Erick E. Wilson: When u plan to reduce a electricity and water do u think is fair pay 400 Dollars a month for a townhouse in homestead is the most expensive water bill and electricity in florida sorry u dont have my vote this is issue is killing everyone here fix that and u will be the mayor forever I love homestead (1 like)

Pages Liked by This Page:

- Homestead Air Reser...
- Homestead Mayor...
- Coffee News Homeste...

Language: English (US), Español, Português (Brasil), Français (France), Deutsch

Privacy, Terms, Advertising, Ad Choices, Cookies, More

Facebook © 2019

Facebook page for Jeff Porter For Mayor (@PorterHomestead). The page shows a post by Jeff Porter For Mayor with 4 likes and 1 comment. The post text reads: "Jeff Porter For Mayor Erick, thank you for your comment. The Mayor does not set the price our residents pay for electricity. I understand your frustration as I have had this issue brought up during the campaign. Just to get the facts straight. Our water rates are among the lowest in Miami-Dade County and our electric rates are in-line with other providers in Florida. Of course it does not help that we have had some of the hottest temperatures on record this summer as we cool our homes."

Comments:

- Jeff Porter For Mayor: Erick, thank you for your comment. The Mayor does not set the price our residents pay for electricity. I understand your frustration as I have had this issue brought up during the campaign. Just to get the facts straight. Our water rates are among the lowest in Miami-Dade County and our electric rates are in-line with other providers in Florida. Of course it does not help that we have had some of the hottest temperatures on record this summer as we cool our homes.

The Council has not raised taxes in the six years since I was elected Mayor. A quick fix solution to lower HPS electric rates would be to raise taxes on all residents of Homestead even the residents who have FPL (I do not believe this is a solution that the majority of residents would support).

If the city were to artificially lower rates and not raise taxes then cuts in spending would have to happen. At this time the largest expense in the city's budget is law enforcement. I do not believe it is a good idea to cut the Police Budget. We have just reported the lowest crime rate in 30 years due to the hard work of our front line officer's.

If other candidate's are making promises they can not keep to get your vote...well there is nothing I can do about that. I am running on a promises-made-promises kept platform, and I can not and will not lie to the voters to get elected.

Pages Liked by This Page:

- Homestead Air Reser...
- Homestead Mayor...
- Coffee News Homeste...

Language: English (US), Español, Português (Brasil), Français (France), Deutsch

Privacy, Terms, Advertising, Ad Choices, Cookies, More

Facebook © 2019

Facebook page for "Jeff Porter For Mayor" (@PorterHomestead). The page includes a navigation menu on the left with options like Home, About, Endorsements, Photos, Videos, Posts, and Community. The main content area displays a post by Jeff Porter For Mayor discussing the city's budget, law enforcement, and crime rate. The post text reads: "time the largest expense in the city's budget is law enforcement. I do not believe it is a good idea to cut the Police Budget. We have just reported the lowest crime rate in 30 years due to the hard work of our front line officer's. If other candidate's are making promises they can not keep to get your vote...well there is nothing I can do about that. I am running on a promises-made-promises kept platform, and I can not and will not lie to the voters to get elected. When I am elected, I will make a promise that we will bring these issues up at the Council. I will do my best to find a solution that is fair to all in order to solve this budgetary problem." A comment by Amarilys Bornot is visible, stating: "We need better transportation here like metro rail the busway it's a nightmare it takes too long to Dadelma metro rail please". The right sidebar shows "Pages Liked by This Page" including Homestead Air Reser..., Homestead Mayor..., and Coffee News Homeste... The bottom of the image shows the Windows taskbar with various open applications and the system clock indicating 4:00 PM on 9/2/2019.

EXHIBIT C

Facebook page for Jeff Porter For Mayor (@PorterHomestead). The page shows a post by James Eric McDonough asking why the page is deleting comments and questioning the page's stance on the First Amendment and the debate. The post includes a video link and a YouTube thumbnail. The page also displays contact information, a page transparency section, and related pages like 'The Intern' and 'Jeff Porter For Florida'.

Jeff Porter For Mayor
@PorterHomestead

Home
About
Endorsements
Photos
Videos
Posts
Community
Create a Page

James Eric McDonough
Jeff why are you deleting our comments?
Jeff why do you hate the First Amendment?
Jeff why are you afraid to come to the debate?
Jeff why are you planning to make up lies about me as you excuse to not attend the debate?
Jeff did I not warn you about this back in 2015?
Here's a little something to jog your memory:
https://www.youtube.com/watch?v=4I7LEG5FG_E

YOUTUBE.COM
Dr. Eric McDonough speaking June, 2015 Homestead City Council...

Like Reply Remove Preview 1m

Sonia Castro You value our opinion so much you erased my comment from yesterday
Like Reply 7h

Contact Us
Send Message
(305) 216-0095
www.porterformayor.com
Political Candidate
Suggest Edits

Page Transparency
Facebook is showing information to help you better understand the purpose of a Page. See actions taken by the people who manage and post content.
Page created - June 20, 2014

Related Pages
The Intern
Philippe Cadorette likes this
Jeff Porter For Florida
Karen Armstrong

Facebook page for Jeff Porter For Mayor (@PorterHomestead). The page shows a post by James Eric McDonough asking why the page is deleting comments and questioning the page's stance on the First Amendment and the debate. The post includes a video link and a YouTube thumbnail. The page also displays contact information, a page transparency section, and related pages like 'The Intern' and 'Jeff Porter For Florida'.

Jeff Porter For Mayor
@PorterHomestead

Home
About
Endorsements
Photos
Videos
Posts
Community
Create a Page

Here's a little something to jog your memory:
https://www.youtube.com/watch?v=4I7LEG5FG_E

YOUTUBE.COM
Dr. Eric McDonough speaking June, 2015 Homestead City Council...

Like Reply Remove Preview 3m

James Eric McDonough Sonia Castro make sure you tag some friends and share this video. He already knows he is not supposed to censor speech on an official page, which his campaign page is.

We will see if he is man enough to apologize for violating our First Amendment rights under title 42 U.S.C. Section 1983, or his possible federal crime under title 18 U.S.C. Section 242.

There are also possible due process violations as well as violations of the Florida Public Records Act, FS. 119. et seq

Like Reply 1m

Contact Us
Send Message
Facebook is showing information to help you better understand the purpose of a Page. See actions taken by the people who manage and post content.
Page created - June 20, 2014

Related Pages
The Intern
Philippe Cadorette likes this
Jeff Porter For Florida
Government Official
ColorWhims - Hawaii P...
Arts & Entertainment

Pages Liked by This Page
Karen Armstrong

Facebook browser window showing the profile of "Jeff Porter For Mayor" (@PorterHomestead). The page includes a navigation menu on the left with options like Home, About, Endorsements, Photos, Videos, Posts, and Community. The main content area displays a post titled "Section 242" with text discussing due process violations and a video player titled "Homestead admitting to hiding Doc Justice's post on Facebook". The right sidebar shows "Pages Liked by This Page" including Homestead Air Reser... and Homestead Mayor... The bottom of the image shows the Windows taskbar with various open applications and the system clock indicating 4:12 PM on 9/2/2019.

Facebook browser window showing the profile of "Jeff Porter For Mayor" (@PorterHomestead).

Navigation menu on the left:

- Home
- About
- Endorsements
- Photos
- Videos
- Posts
- Community
- Create a Page

Main content area:

Section 242

There are also possible due process violations as well as violations of the Florida Public Records Act, FS. 119 et seq.

Like Reply 5m

James Eric McDonough Sonia you should also know that the City's public information officer admitted under oath in deposition to hiding comments from the Facebook pages

<https://www.youtube.com/watch?v=LVC6gWmloqI&t>

YOUTUBE.COM

Homestead admitting to hiding Doc Justice's post on Facebook

Like Reply Remove Preview 1m

Sonia Castro You value our opinion so much you erased my comment from yesterday

Like Reply 7h

Right sidebar:

Contact Us Send Message

Pages Liked by This Page

- Homestead Air Reser... Like
- Homestead Mayor... Liked
- Coffee News Homeste... Like

Language options: English (US), Español, Português (Brasil), Français (France), Deutsch

Privacy, Terms, Advertising, Ad Choices, Cookies, More

Facebook Karen Armstrong Chat (328) Show all 5 new notifications

Windows taskbar:

- RotarySDNL.jpg
- Rotary.jpg
- Dorian.png
- Election info.jpg
- Porter Financial Di...pdf

Type here to search

System clock: 4:12 PM 9/2/2019

Facebook page for Jeff Porter For Mayor (@PorterHomestead).

Jeff Porter For Mayor
@PorterHomestead

Home
About
Endorsements
Photos
Videos
Posts
Community
[Create a Page](#)

Posts

- Stan Nelson** Can I vote for you?
6w · 2
- Erick E. Wilson** When u plan to reduce a electricity and water do u think is fair pay 400 Dollars a month for a townhouse in homestead is the most expensive water bill and electricity in florida sorry u dont have my vote this is issue is killing everyone here fix that and u will be the mayor forever. I love homestead
5d · 1
- Jeff Porter For Mayor** Erick, thank you for your comment. The Mayor does not set the price our residents pay for electricity. I understand your frustration as I have had this issue brought up during the campaign. Just to get the facts straight. Our water rates are among t... See More
5d · Edited · 9
- Amarilys Bornot** We need better transportation here like metro rail the busway it's a nightmare it takes to long to Dadela metro rail please
2d

Pages Liked by This Page

- Homestead Mayor... ✓ Liked
- Good Government Init... Like
- Coffee News Homeste... Like

English (US) · Español · Português (Brasil) · Français (France) · Deutsch

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Taskbar: RotarySDNL.jpg, Rotary.jpg, Dorian.png, Election info.jpg, Porter Financial DL...pdf, Chat (388)

System tray: 12:29 AM, 9/3/2019

EXHIBIT D

Facebook page for "Jeff Porter For Mayor" (@PorterHomestead). The page shows 75 likes, 13 comments, and 22 shares. Comments include:

- Barbara L. Wheeler: A youth center would be fantastic for our city. 5w
- Barbara Agramonte: Jeff has been and will be the best Mayor of Homestead. I was born here in 1947. I have been thru alot of changes. He has done more for this city. 6w
- Iglesia Camino Del Rey: Hello Mayor, Although we love the city and its improvements, please do not drive and make things difficult for churches and places of worship that work in this city to continue the efforts in providing moral foundations, encourage virtues within our c... See More. 5w
- Miguel Hernandez: I told you once that i felt that you, to me have been the best mayor of Homestead and i stand by my words. what ever you need jeff including my vote. 4w

Related Pages include: The Intern, Jeff Porter For Florida, ColorWhims -Hawaii P..., and Homestead Mayor... (Liked).

Pages Liked by This Page include: Homestead Mayor... (Liked), Good Government Init..., and Coffee News Homeste... (Liked).

Taskbar: RotarySDNL.jpg, Rotary.jpg, Dorian.png, Election info.jpg, Porter Financial Di...pdf. System clock: 12:28 AM 9/3/2019.

Facebook page for "Jeff Porter For Mayor" (@PorterHomestead). The page shows comments including:

- Miguel Hernandez: I told you once that i felt that you, to me have been the best mayor of Homestead and i stand by my words. what ever you need jeff including my vote. 6w. 2 Replies.
- Mark Diehl: Please have more streetlights installed in dark residential areas. I think it will help reduce crime. 6w.
- Shari Jones Dingley: You know our family stands behind you. 6w. Edited.
- Diana Wilson: You have my vote. 6w.
- Stan Nelson: Can I vote for you? 6w.
- Erick E. Wilson: When u plan to reduce a electricity and water do u think is fair pay 400 Dollars a month for a townhouse in homestead is the most expensive water bill and electricity in florida sorry u dont have my vote this is issue is killing everyone here fix that and u will be the mayor forever.I love homestead.

Pages Liked by This Page include: Homestead Mayor... (Liked), Good Government Init..., and Coffee News Homeste... (Liked).

Taskbar: RotarySDNL.jpg, Rotary.jpg, Dorian.png, Election info.jpg, Porter Financial Di...pdf. System clock: 12:29 AM 9/3/2019.

Facebook browser window showing the "Jeff Porter For Mayor" page. The page includes a navigation menu on the left with options like Home, About, Endorsements, Photos, Videos, Posts, and Community. The main content area displays a post by Stan Nelson asking "Can I vote for you?" and a comment by Erick E. Wilson regarding electricity and water costs. The right sidebar shows "Pages Liked by This Page" including "Homestead Mayor..." and "Good Government Init...". The bottom of the browser window shows the Windows taskbar with various open applications and the system clock indicating 12:29 AM on 9/3/2019.

Facebook browser window showing the "Jeff Porter For Mayor" page. The page includes a navigation menu on the left with options like Home, About, Endorsements, Photos, Videos, Posts, and Community. The main content area displays a post by Stan Nelson asking "Can I vote for you?" and a comment by Erick E. Wilson regarding electricity and water costs. The right sidebar shows "Pages Liked by This Page" including "Homestead Mayor..." and "Good Government Init...". The bottom of the browser window shows the Windows taskbar with various open applications and the system clock indicating 12:29 AM on 9/3/2019.